

Evren Eryurek  
12/03/2020

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1 - EVREN ERYUREK -  
23 IN THE UNITED STATES DISTRICT COURT  
4 FOR THE SOUTHERN DISTRICT OF NEW YORK

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4 ULKU ROWE,

5 Plaintiff,

6 Case No.  
7 19 Civ. 08655 (LGS) (GWG)

8 v.

9 GOOGLE LLC

10 Defendant.

----- X

11 DATE: December 3, 2020

12 TIME: 11:37 a.m.

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## 14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

15

OF EVREN ERYUREK, held via Zoom, pursuant to

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Notice, before Hope Menaker, a Shorthand Reporter

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and Notary Public of the State of New York.

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2 Stevens?

3                   A.         Brian was in and out, so he would  
4 travel a lot and I don't know that he had a  
5 permanent office. I think he had an office  
6 further down the hallway from us.

7                   Q.         And were the other technical  
8 directors all located in California or were they  
9 in other locations?

10                  A.         They were all over the place.

11                  Q.         And do you recall some of the places  
12 where other technical directors were located?

13                  A.         Texas, New York, Australia, Europe.  
14 I'm trying to remember if we had anything in  
15 Canada. We didn't have anything in Canada. And  
16 California.

17                  Q.         And so were these staff meetings in  
18 person or were they held remotely through  
19 technology?

20                  A.         Depended on the staff meetings.  
21 Sometimes in person; some largely virtual.

22                  Q.         While we're talking about in person  
23 and virtual it reminds me: Going back to your  
24 other prior experience, in what roles did you work  
25 in Cloud-based technology?

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2                 A.         In GE Healthcare, I was the Cloud's  
3 champion for the healthcare industry and I had  
4 deployed solutions on both issues; and in my last  
5 releases of what we called GE Health Cloud, it was  
6 on AWS and so I used both of them.

7                 Q.         So how many years of experience  
8 had you had with Cloud-based technology at the  
9 time --

10                MR. GAGE: Objection.

11                Q.         -- you joined Google?

12                A.         As an evangelist, probably eight  
13 years or so easily; and I had managed and deployed  
14 my solutions either on my own Cloud data centers  
15 or somebody else's Cloud data centers. So  
16 hands-on experience goes back to my GE  
17 Transportation days, so go from 2005 to now.

18                Q.         If we use Cloud versus on-prem, are  
19 those -- is that the right terms?

20                A.         Yes.

21                Q.         Okay. At this point in time is more  
22 technology Cloud based or on-prem based.

23                MR. GAGE: Objection.

24                A.         On-prem based.

25                Q.         And do you know in the U.S., roughly

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2 initiatives?

3                   MR. GAGE: Objection.

4                   A. Yes.

5                   Q. Does the PM role involve  
6 corroborating across functional and product area  
7 boundaries?

8                   MR. GAGE: Objection.

9                   A. Yes.

10                  Q. Does the PM role involve working with  
11 broader Google engineering and research teams?

12                  MR. GAGE: Objection.

13                  A. Yes.

14                  Q. In what ways is the PM role similar  
15 to the role that you were performing in OCTO?

16                  A. Customer sponsorship evangelization,  
17 working with other teams and so forth, but nothing  
18 to do with the -- how we build a product, how we  
19 define a strategy, how we execute that strategy.

20                  Q. And so the next question is: How is  
21 the PM role different from the role you were  
22 performing in OCTO?

23                  A. We are responsible for defining  
24 long-term roadmaps, executing them incrementally  
25 on quarterly, whatever short term, and the

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2 understanding where the trends are, market trends  
3 are, and bringing it back to what our products and  
4 platforms need to be doing.

5                   And another responsibility, we have  
6 to make sure that our revenue mark targets and so  
7 forth are projected accordingly and we deliver on  
8 our expected numbers.

9                   Q.         With respect to your role in PM, do  
10 you understand that you're evaluated against a  
11 leveling guideline?

12                  A.         Yes.

13                  Q.         And those engineering leveling  
14 guidelines that we looked at before, are those  
15 also relevant to the PM role?

16                  A.         Yes.

17                  MS. GREENE: Okay, I'm just about  
18 done. What I want to do is take a short  
19 break and then we'll come back and finish up.

20                  THE WITNESS: So what -- how long do  
21 we need?

22                  MS. GREENE: Let's take ten minutes.

23                  MR. GAGE: Okay, we'll come back ten  
24 minutes after the hour.

25                  THE WITNESS: All right.